

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of
Telecommunications and Energy on its own Motion
into the Appropriate Pricing, based upon Total
Element Long-Run Incremental Costs, for
Unbundled Network Elements and Combinations of
Unbundled Network Elements, and the Appropriate
Avoided Cost Discount for Verizon New England,
Inc. d/b/a Verizon Massachusetts' Resale Services
in the Commonwealth of Massachusetts

D.T.E. 01-20

**AT&T's NINETEENTH SET OF INFORMATION
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits to Verizon the following
information requests. Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the name
of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if Verizon
subsequently receives or becomes aware of additional information responsive to these
requests.

If an answer refers to Verizon's response to another information request in this proceeding,
please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon
cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege
claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations

The page number references in the following questions are to the hard copy of the Panel

Testimony of Messrs Albert, Anglin, Livecchi and Ms. Matt that was distributed by Verizon on May 8, 2001.

INFORMATION REQUESTS

ATT – VZ 19-1 Provide the total . recurring and non-recurring charges proposed in the instant proceeding and a detailed listing of all the individual component recurring and non-recurring charges that make up the total charges for each of the following scenarios. In each of the scenarios listed, AT&T wishes to purchase unbundled horizontal cable, unbundled riser cable, or unbundled horizontal and riser cable from Verizon-MA, for use in multiple tenant units (“MTUs”). For simplicity, assume in each scenario that AT&T is ordering UNEs in the Metro region. Please provide specific page and line, and/or column references to Verizon-MA’s cost study . where the proposed component charges for each scenario can be found. Also, Indicate whether any additional charges apply which are not contained in the instant cost study but currently exist in Verizon’s tariff. For charges contained in both the existing tariff and the Verizon-MA cost study, please provide and cite, in the manner described above, both charges indicating which is drawn from the tariff and which from the cost study. For charges contained in either the Verizon-MA cost study or the existing tariff but not contained in both, please provide and cite, in the manner described above, each charge indicating whether its source is the existing tariff or the Verizon-MA cost study.

(a)For each scenario in (a), assume that AT&T will be performing all its own cross connections and testing and that the MTU is twelve stories in height but AT&T’s customer is located on the tenth story.

1)AT&T purchases only unbundled horizontal cable from Verizon-MA, including all facilities and equipment necessary to provide dial tone to the end-user, i.e., AT&T does not use Verizon’s riser cable.

2)AT&T purchases unbundled riser cable from Verizon-MA, including all connections, equipment and facilities. Assume that the horizontal cable is not owned by Verizon.

3)AT&T purchases both unbundled horizontal and riser cable from Verizon-MA, including all facilities and equipment necessary to provide dial tone to the end-user.

(b)For each scenario in (b), assume that Verizon-MA performs all required cross connections and testing for AT&T and that the MTU is twelve stories in height but AT&T’s customer is located on the tenth story.

1)AT&T purchases only unbundled horizontal cable from Verizon-MA, including all facilities and equipment necessary to provide dial tone to the end-user, i.e., AT&T does not use Verizon’s riser cable.

- 2)AT&T purchases unbundled riser cable from Verizon-MA, including all connections, equipment and facilities. Assume the horizontal cable is not owned by Verizon.
- 3)AT&T purchases both unbundled horizontal and riser cable from Verizon-MA, including all facilities and equipment necessary to provide dial tone to the end-user.

Respectfully submitted,
AT&T COMMUNICATIONS OF NEW ENGLAND, INC.
By its attorneys,

Jeffrey F. Jones
Kenneth W. Salinger
Jay E. Gruber
Emily R. Donovan
Kevin R. Prendergast
Palmer & Dodge LLP
One Beacon Street
Boston, MA 02118
(617) 573-0100

June 19, 2001